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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ESTATE OF NEKIYLO DEWAYNE GRAVES, by
and through Eureka Graves as next-of-kin, personal
representative and Special Administrator
SHANNON L. EVANS; EUREKA GRAVES, an
individual,

Plaintiffs,

vs.

NYE COUNTY, NEVADA, a political subdivision
of the State of Nevada, JOHN KAKAVULIAS, an
individual and employee of Nye County, Nevada;
SOC NEVADA, LLC, a foreign limited liability
company d/b/a SOC, LLC; TREQUIS HARRIS, an
individual and employee of SOC Nevada, LLC;
DOES I -X; ROES I-X,

Defendants.

Case No. 2:20-cv-02359-JAD-DJA

**~~PROPOSED~~ STIPULATION TO
STAY DISCOVERY AND TO
EXTEND TIME FOR PLAINTIFFS
TO RESPOND TO DEFENDANTS
SOC LLC AND TREQUIS HARRIS'S
MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

FIRST REQUEST TO EXTEND TIME

[LR IA 6-1]

Under Fed. R. Civ. P. 26 and this Court's Minute Order (the "Minute Order"), entered
February 2, 2022 [ECF No. 74], plaintiffs Estate of Nekiyllo Dewayne Graves, Shannon L. Evans,

Eureka Graves (collectively, the “Plaintiffs”), and defendants Nye County, Nevada (“Nye County”), John Kakavulias (“Kakavulias”), SOC Nevada, LLC d/b/a SOC, LLC (“SOC”), and Tre’Quis Harris (“Harris;” collectively, the “Defendants;” jointly with the Plaintiffs the “Parties”), submit this Stipulation to Stay Discovery and to Extend Time for Plaintiffs to Respond to Defendants SOC LLC and Tre’Quis Harris’s Motion to Dismiss First Amended Complaint.

The Parties state that on January 7, 2022, Nye County and Kakavulias filed their Motion to Dismiss Plaintiffs’ First Amended Complaint (the “Nye County Defendants’ Motion to Dismiss”) [ECF No. 54]. On February 1, 2022, SOC and Harris filed their Motion to Dismiss Plaintiffs’ First Amended Complaint (the “SOC Defendants’ Motion to Dismiss”) [ECF No. 69]. Concurrently with the SOC Defendants’ Motion to Dismiss, SOC and Harris filed their First Motion to Stay Discovery (“Motion to Stay”) [ECF No. 71]. The Motion to Stay represented that the Plaintiffs did not oppose a limited stay of discovery applicable to only the deadline for the parties to disclose expert witnesses, March 7, 2022, and that Plaintiffs may agree to a complete stay of discovery upon reviewing the SOC Defendants’ Motion to Dismiss. Nye County and Kakavulias did not object to a stay of discovery if the stay also applied to them. This Court’s Minute Order directed the Parties to further meet and confer to determine whether a stipulation staying discovery was possible. Accordingly, the Parties now stipulate to stay discovery and to Plaintiffs extension of time to respond to the SOC Defendants Motion to Dismiss as follows:

1. The Parties stipulate to stay all discovery and obligations under Fed. R. Civ. P. 26 until 30 days after the Court rules upon the Nye County Defendants’ Motion to Dismiss and the SOC Defendants’ Motion to Dismiss, whichever is later.

2. The Plaintiffs expressly reserve the right to potentially move this Court for limited discovery to oppose the Nye County Defendants’ Motion to Dismiss and the SOC Defendants’ Motion to Dismiss.

3. The Defendants expressly reserve the right to oppose any potential motion for limited discovery submitted by Plaintiffs.

4. After the Court rules upon the Nye County Defendants’ Motion to Dismiss and the SOC Defendants’ Motion to Dismiss, if the Plaintiffs’ First Amended Complaint [ECF No. 35] is not

dismissed in its entirety, the remaining Parties will submit an updated discovery plan within 30 days after the Court's last ruling on the Defendants' motions to dismiss.

5. The Parties further Stipulate that Plaintiffs shall have until (i) March 18, 2022 or (ii) 30 days after an unredacted version of the SOC Defendants' Motion to Dismiss is provided to Plaintiffs, following resolution of the Defendants' First Motion for Protective Order [ECF No. 53] and/or a ruling on the Defendants' Motion to Seal [ECF No. 68], to respond to the SOC Defendants' Motion to Dismiss, whichever occurs later. Presently, Plaintiffs' response is due on February 15, 2022.

6. Pursuant to LR IA 6-1 this is Plaintiffs first request to extend the time to respond to the SOC Defendants' Motion to Dismiss and Defendants stipulate to that request.

AGREED TO: This 16th day of February 2022.

**SOC NEVADA, LLC d/b/a SOC, LLC AND NYE COUNTY, NEVADA AND
TRE'QUIS HARRIS JOHN KAKAVULIAS**

By: /s/ Paul J. Anderson

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**ESTATE OF NEKIYLO DEWAYNE
GRAVES, SHANNON L. EVANS, AND
EUREKA GRAVES**

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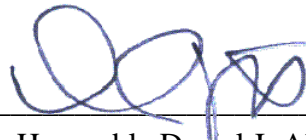
Michael Lanigan, Esq.

*Attorneys for plaintiffs, Estate of Nekiyo
DeWayne Graves Shannon L Evans, and Eureka
Graves*

ORDER

IT IS SO ORDERED.

Dated this 17th day of February, 2022



The Honorable Daniel J. Albregts
United States Magistrate Judge